NJID 825580

PHELAN HALLINAN DIAMOND & JONES, PC 1617 JFK Boulevard, Suite 1400 Philadelphia, PA 19103 856-813-5500

Attorneys for CARRINGTON MORTGAGE SERVICES, LLC AS SERVICER FOR THE BANK OF NEW YORK MELLON, F/K/A THE BANK OF NEW YORK AS TRUSTEE FOR REGISTERED HOLDERS OF CWABS, INC., ASSET-BACKED CERTIFICATES, **SERIES 2005-13**

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13

JOSEPH J. ROVITO A/K/A

JOSEPH ROVITO : CASE NO. 19-19613-VFP

KAREN A. ROVITO A/K/A

KAREN ROVITO : NOTICE OF MOTION FOR

> : RELIEF FROM AUTOMATIC : STAY PURSUANT TO 11 USC

Debtor(s) : **SECTION 362(d)**

JOSEPH J. ROVITO RUSSELL L. LOW 15 WEST 19TH STREET LOW & LOW

WEEHAWKEN, NJ 07086 **505 MAIN STREET**

SUITE 304

KAREN A. ROVITO HACKENSACK, NJ 07601

15 West 19th Street

WEEHAWKEN, NJ 07086 MARIE-ANN GREENBERG

CHAPTER 13 STANDING TRUSTEE

JOSEPH J. ROVITO 30 TWO BRIDGES RD

1088 OLD FREEHOLD ROAD DOVER **SUITE 330**

TOWNSHIP, NJ 08753-5260 FAIRFIELD, NJ 07004

KAREN A. ROVITO U.S. TRUSTEE

1088 OLD FREEHOLD ROAD DOVER US DEPT OF JUSTICE

TOWNSHIP, NJ 08753-5260 OFFICE OF THE US TRUSTEE

ONE NEWARK CENTER STE 2100

NEWARK, NJ 07102

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY (REAL PROPERTY)

CARRINGTON MORTGAGE SERVICES, LLC AS SERVICER FOR THE BANK OF NEW YORK MELLON, F/K/A THE BANK OF NEW YORK AS TRUSTEE FOR REGISTERED HOLDERS OF CWABS, INC., ASSET-BACKED CERTIFICATES, SERIES 2005-13 (hereinafter 'Movant') has filed papers with the Court to have an Order entered granting it relief from the automatic stay against the property commonly known as 1088 OLD FREEHOLD RD, DOVER TOWNSHIP, NJ 08753-5260.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the Court to grant Movant relief from the automatic stay regarding the above real property, or if you want the Court to consider your views on the Motion, then on or before <u>07/11/2019</u> you or your attorney must:

File with the Court a written response to Movant's Motion explaining your position. Your response must be filed with the Bankruptcy Clerk of the United States Bankruptcy Court, 50 Walnut Street, Newark, NJ 07102.

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

/s/ Nicholas V. Rogers

Nicholas V. Rogers, Esq. Phelan Hallinan Diamond & Jones, PC 1617 JFK Boulevard, Suite 1400 Philadelphia, PA 19103

Tel: 856-813-5500 Ext. 42689

Fax: 856-813-5501

Email: nicholas.rogers@phelanhallinan.com

MARIE-ANN GREENBERG CHAPTER 13 STANDING TRUSTEE 30 TWO BRIDGES RD SUITE 330 FAIRFIELD, NJ 07004

U.S. TRUSTEE
US DEPT OF JUSTICE
OFFICE OF THE US TRUSTEE

ONE NEWARK CENTER STE 2100 NEWARK, NJ 07102

If you are opposing the Order Movant is seeking from the Court, you must attend the hearing scheduled to be held on 07/18/2019 at 10:00 a.m. at the United States Bankruptcy Courthouse, 50 Walnut Street, Newark, NJ 07102, before the Honorable Vincent F. Papalia, presiding.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Dated: June 4, 2019

/s/ Nicholas V. Rogers Nicholas V. Rogers, Esq. Phelan Hallinan Diamond & Jones, PC 1617 JFK Boulevard, Suite 1400 Philadelphia, PA 19103

Tel: 856-813-5500 Ext. 42689

Fax: 856-813-5501

Email: nicholas.rogers@phelanhallinan.com